

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Criminal No. 1:23CR54

DAVID ANDERSON,

Defendants.

UNITED STATES' MOTION FOR A PROTECTIVE ORDER

Now comes the United States of America and William Ihlenfeld, United States Attorney for the Northern District of West Virginia, by Sarah E. Wagner, Assistant United States Attorney, and pursuant to Fed. R. Crim. P. 16(d)(1) and Rule 16.09 of the Local Rules of Criminal Procedure, moves the court to enter a discovery protective order prohibiting defense counsel from allowing copies, or photographs, of sensitive discovery provided by the United States, to be disseminated beyond counsel's immediate custody or control. In support thereof, the government states the following:

1. Discovery in this case involves production of confidential, sensitive and private information for which special protection from dissemination is warranted. Such material includes, but is not limited to, cell phone information, numerous personal identifiers (e.g. dates of birth and social security numbers), audio/video recordings disclosed by the United States, and medical records which should only be used for litigation purposes of this case.

2. The proposed Protective Order provides that discovery materials containing private health information, personal identifying information of any individual (e.g., social security number and date of birth), banking records, tax records, any and all sensitive information including but not limited to: bank account information of alleged victims of the defendant memorandum of interviews or debriefing interviews, cell phone information and documents containing the names

or addresses of individuals not charged in the criminal indictment shall remain in the sole possession of defense counsel, and shall not be provided to defendant or any other person, except as authorized.

3. Defense counsel are officers of the court, and the undersigned knows they will handle the material ethically under the requested order prohibiting dissemination of sensitive personal materials.

For the reasons set forth above, the United States respectfully requests that this court enter the proposed protective order, as attached.

Respectfully submitted,

WILLIAM IHLENFELD
United States Attorney

By: /s/ Sarah E. Wagner
Assistant United States Attorney
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CERTIFICATE OF SERVICE

I, Sarah E. Wagner, certify that on September 21, 2023, I electronically filed the foregoing **UNITED STATES' MOTION FOR A PROTECTIVE ORDER** with the Clerk using the CM/ECF system, which will send notification of such filing to defendants' counsel:

L. Richard Walker, Esquire

/s/ Sarah E. Wagner
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